CHRISTIAN, SAMSON, JONES & CHISHOLM, PLLC

Attorneys at Law

DAVID R. CHISHOLM CALVINT. CHRISTIAN KIRBY S. CHRISTIAN PAUL E. FICKES, LL.M. in Tax 310 WEST SPRUCE MISSOULA, MONTANA 59802 TEL: (406)721-7772 FAX: (406)721-7776 EMAIL: jason@csjlaw.com KEVIN S. JONES LIANA J. MESSER RICHARD J. SAMSON JASON B. WILLIAMS

May11,2007

Ms. Marlene H. Dortcli Office of the Secretary Federal Communications Commissions 445 – 12th Street, SW Washington, DC 20554

Filed Via ECFS

RE: Range Teleplioiie Cooperative Inc's. Petition for Waiver of the Commission's Universal Service Rules, CC Docket No. 96-45.

Dear Ms. Dortch:

On March 28,2007, Range Teleplione Cooperative Inc. ("Range") filed a Petition for a one time Waiver of 47CFR §54.307(c) as applied to Range's Foui-th Quarter 2005 line count data. On April 30,2007, Range filed an Affidavit supplementing that Petition that provided additional factual details related to Range's request. The attached Affidavit further supplements Range's Petition.

Specifically, the attached Affidavit shows that Range has impleinented procedures and safeguards to insure that all future regulatory filings will be submitted on a timely basis.

Please contactine if you have any questions.

Sincerely,

CHRISTIAN, SAMSON, JONES & CHISHOLM, PLLC

Jason B. Williams

JBW/lf Enc.

AFFIDAVIT OF ROBIN STEPHENS

State of Montana)
County of Rosebud	<i>)</i>

I, Robin Stephens, being first duly sworn, depose and state as follows:

- 1. I have been Chief Financial Officer ("CFO") of Range Telephone Cooperative, Inc., ("Range") since July 1, 1999. I am currently acting Chief Executive Officer/General Manager of Range and will become the permanent Chief Executive Officer/General Manager of Rmge on July 1,2007, Range hired a new CFO, Frank Anderson on March 1, 2007.
- 2. Range is a facilities-based telecommunications company that is both an incumbent local exchange carrier and a competitive local exchange carrier providing service insoutheastern Montana and northeastern Wyoming.
- 3. In addition to my other **duties** as acting CEO/General Manager, I am responsible for supervising all necessary filings with the Universal Service Administration Company ("USAC") necessary for Range to receive federal universal service support.
- 4. On March 21, 2006, the Montana Public Service Commission ("Montana PSC") designated Range as a competitive eligible telecommunications carrier for the Forsyth, Montana, local exchange. Range's study area number is 489007.
- 5. On March 25,2007, Range filed a petition for a one-time waiver of 47 CFR § 54,307 as applied to Range's fourth-quarter 2005 line counts as it failed to timely file such line counts in accordance with Commission rules.
- 6. Range's ILEC has never missed a USAC filing deadline as it has processes and procedures in place to ensure all such filings are timely submitted.
- 7, As acting CEO/General Manager, I have implemented the same procedures and safeguards for Range's CLEC operation similar to its ILEC operation that ensure that future fillings will be submitted on a timely and accurate basis.

8. Such procedures include, but are not limited to, the following: 1) Range has centralized all of its regulatory reporting functions within its accounting/finance group; 2) Range has an internal system that tracks compliance matters and alerts its accounting/finance staff as to when such regulatory filings are due; and 3) the accounting/financing group in charge of regulatory filings will be directly overseen by myself and Range's new CFO.

Dated this 11th day of May, 2007.

Robin Stephens

STATE **OF** MONTANA) ss County of Rosebud)

On this 11th day of May 2007 before me, the undersigned, a Notary Public for the State of Montana, personally appeared Robin Stephens, known to me to be the person whose name is subscribed to the within instrument, and acknowledged to me that he executed the same.

IN WITNESS WHEREOF, I have hereunto set my hand and seal the day and year

first above written.

Print Name: Cassandra Shara Notary Public for the State of Montana

Residing at: Residual M.

My Commission Expires: \Secondar 18 357